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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Konstantinos Vadevoulis, Jim)	
Vadevoulis, and Paul Vadevoulis,)	
)	
Plaintiffs,)	
)	No. 08 C 1251
v.)	
)	
Deutsche Bank AG; Deutsche Bank)	Hon. Joan Humphrey Lefkow
Securities, Inc., d/b/a/ Deutsche Bank)	
Alex. Brown, and American Express Tax)	
and Business Services, Inc., n/k/a RSM)	
McGladrey LLC)	
)	
Defendants.)	

PROPOSED SCHEDULING ORDER

The parties, on June 27, 2008, having held a scheduling conference attended by Adam P. Merrill and Scott F. Hessell for plaintiffs, Seth C. Farber, Kelly Librera, and Aaron Lang for the Deutsche Bank defendants, and Lynne M. Fischman Uniman and Anju Uchima for defendant American Express Tax & Business Services, Inc., n/k/a RSM McGladrey LLC, as required by Rule 26(f), submit the following proposed scheduling order:

- (A) The parties believe that an early settlement conference will not likely result in the disposition of the case.
- (B) The parties have already provided Rule 26(a)(1) disclosures. The parties propose that the parties shall exchange the documents identified in the Rule 26(a)(1) disclosures by July 18, 2008. Defendants will produce applicable insurance policies by July 18, 2008 or as soon thereafter as practicable.
- (C) Plaintiffs have indicated they intend to amend their complaint as of right pursuant to Rule 15(a)(1). Plaintiffs shall have until July 21, 2008 to file their amended complaint. The briefing schedule previously set for defendants' motions to dismiss the initial complaint is hereby vacated.


- (D) Defendants shall have until August 29, 2008 to answer or otherwise respond to the amended complaint. If defendants file a motion with respect to the amended complaint, plaintiffs shall have until September 26, 2008 to respond to the motion. Any such motions need not be noticed or presented at a hearing. Defendants shall have until October 14, 2008 to reply in support of their motions.
- (E) Additional parties shall be joined no later than 60 days prior to the close of non-expert discovery.
- (F) Status hearing is set for 10/21/2008 at 9:30 a.m.
- (G) Parties shall respond to outstanding written discovery. No further discovery shall be initiated without further order of court.

Consent to Proceed Before a Magistrate Judge

The parties do not consent to have their case proceed before a magistrate judge.

ENTER:

Date: July 31, 2008


U.S. District Judge Joan H. Lefkow